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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Murat Ozdemir,

Plaintiff,

v.

Merrick Garland, Attorney General of the
United States of America; Alejandro
Mayorkas, Secretary of Department of
Homeland Security; UR Jaddou, U.S
Citizenship and Immigration Services; Clyde
Moore Field Office Director, Las Vegas
Field Office U.S. Citizenship and
Immigration Services;

Defendants.

Case No. 2:22-cv-01799-CDS-DJA

Stipulation and Order

(First Request)

Plaintiff Murat Ozdemir and United States of America, on behalf of Federal
Defendants Merrick Garland, Attorney General of the United States of America, Alejandro
Mayorkas, Secretary of Department of Homeland Security, UR Jaddou, U.S. Citizenship
and Immigration Services, Clyde Moore, Field Office Director, Las Vegas Field Office
U.S. Citizenship and Immigration Services ("Federal Defendants"), hereby stipulate and
agree as follows:

Plaintiff filed his Complaint on November 2, 2022.

Plaintiff served the United States with a copy of the Summons and Complaint via
Certified Mail on February 16, 2023.

1 The current deadline for the United States to respond to the Plaintiff's Complaint is
2 on April 17, 2023.

3 Plaintiff and the Federal Defendants, through undersigned counsel, stipulate and
4 request that the Court approve a 30-day extension of time, from April 1, 2023 to May 17,
5 2023, for Federal Defendants to file a response to the Complaint, ECF No. 2. This is the
6 first request for an extension of time.

7 The parties request this additional time to allow them to engage in discussions
8 directed at resolving this matter, as additional information has been requested by the agency
9 from the Plaintiff regarding the matters raised in the Plaintiff's complaint. The parties have
10 begun those discussions and hope they can resolve the matter without the need for
11 additional cost or further court intervention.

12 Therefore, the parties request that the Court extend the deadline for the United
13 States to answer or otherwise respond to May 17, 2023.

14 This stipulated request is filed in good faith and not for the purposes of undue delay.

15 Respectfully submitted this 12th day of April 2023.

16 LAW OFFICES OF PETER L. ASHMAN

JASON M. FRIERSON
United States Attorney

17
18 /s/ Peter L. Ashman
19 PETER L. ASHMAN, ESQ.
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23 *Attorney for Plaintiff*

/s/ Virginia T. Tomova
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24
25 **IT IS SO ORDERED:**

26 
27 DANIEL J. ALBREGTS
28 UNITED STATES MAGISTRATE JUDGE

DATED: April 13, 2023